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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MICHELLE H. PRO,

Plaintiff,

vs.

BARCLAYS BANK, DELAWARE;
EQUIFAX INFORMATION SERVICES,
LLC; FIRST PREMIER BANK;
TRANSUNION, LLC,

Defendants.

Case No.: 2:18-cv-01454-MMD-GWF

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND DEFENDANT
BARCLAYS BANK DELAWARE'S
TIME TO RESPOND TO COMPLAINT**

(THIRD REQUEST)

This Stipulation to Extend Time to Respond to Complaint is made by and between Plaintiff Michelle H. Pro ("Plaintiff") and Defendant Barclays Bank Delaware ("Barclays") through their respective counsel, in light of the following facts:

RECITALS

A. Plaintiff filed the Complaint ("Complaint") against Barclays on or about August 7, 2017.

B. Barclays was served with the Complaint on August 13, 2018.

C. A Stipulation and Order was granted for Barclays' to Answer Complaint from September 4, 2018 to October 2, 2018.

D. A second Stipulation and Order was granted for Barclays' to Answer Complaint from October 2, 2018 to October 22, 2018.

E. Barclays' current deadline to respond is October 22, 2018.

1 F. The parties agreed to extend Barclays' time to respond to the Complaint through
2 November 5, 2018, in order to give Barclays time respond to Plaintiff's recent settlement offer.

3 G. There is good cause to grant this stipulation because Barclays requires additional
4 time to respond to Plaintiff's settlement offer, and to allow the parties additional time for
5 settlement discussions in the event that Barclays does not accept Plaintiff's current offer.

6 H. Pursuant to Local Rule IA 6-2 and Local Rule 7.1, Plaintiff and Barclays
7 respectfully request that the Court extend Barclays' time to respond to Plaintiff's Complaint
8 through November 5, 2018.

9 **STIPULATION**

10 NOW, THEREFORE, Plaintiff and Barclays hereby stipulate and agree that Barclays
11 has up to and including November 5, 2018, to file a response to Plaintiff's Complaint.

12 **IT IS SO STIPULATED**

13 DATED: October 17, 2018 LEWIS ROCA

14 ROTHGERBER CHRISTIE LLP

15 By: /s/ Erik Foley
16 J Christopher Jorgensen
17 Erik Foley
18 *Attorneys for Defendant*
19 *Barclays Bank Delaware*

20 DATED: October 17, 2018 HAINES & KRIEGER, LLC

21 By: /s/ David Krieger
22 David H. Krieger
23 *Attorney for Plaintiff*
24 *Michelle H. Pro*

25 **ORDER**

26 **IT IS SO ORDERED**

27 

28 UNITED STATES MAGISTRATE JUDGE

DATED 10-19-2018